

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**TREVOR FITZGIBBON,**

**PLAINTIFF**

**vs.**

**JESSELYN A. RADACK,**

**DEFENDANT**

**Civil Action No. 3:19-cv-477-REP**

**CONSENT MOTION FOR EXTENSION OF TIME**

COMES NOW Defendant Jesselyn A. Radack (“Radack”), by counsel, with the consent of Defendant Trevor Fitzgibbon (“Fitzgibbon”) and files this Consent Motion for Extension of Time, to and including May 1, 2020, within which to file her Fed. R. Civ. P. 26(a)(2) disclosures, and in support thereof, states as follows:

1. Pursuant Local Civil Rule 26(D)(2) and General Order No. 2020-07, Radack’s expert disclosures are due on April 22, 2020.

2. Due to disruptions caused by COVID-19 undersigned counsel requests that Radack’s expert disclosure deadline be extended to and including May 1, 2020. This extension will allow sufficient time for Radack’s experts to complete their reports.

3. Counsel for Fitzgibbon has indicated his consent to the requested extension of time.

WHEREFORE, Defendant Jesselyn A. Radack, requests this Court enter an order extending the time up to and including May 1, 2020, within which she can submit her disclosures required by Fed. R. Civ. P. 26(a)(2).

Dated: April 6, 2020

Respectfully submitted,

/s/ D. Margeaux Thomas

D. Margeaux Thomas (VSB #75582)

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*Counsel for Defendant Jesselyn A. Radack*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2020, a copy of the foregoing document was filed with the Court electronically. Notice of this filing will be sent automatically by the Court's CM/ECF system to the following parties:

Steven S. Biss  
300 West Main Street, Suite 102  
Charlottesville, VA 22903  
*Counsel for Plaintiff*

/s/ D. Margeaux Thomas  
D. Margeaux Thomas (VSB #75582)